

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE 1, individually, and on behalf of all :
others similarly situated, JANE DOE 2, individually, :
and on behalf of all others similarly situated, JANE :
DOE 3, individually, and on behalf of all others :
similarly situated, JANE DOE 4, individually, and :
on behalf of all others similarly situated, JANE DOE :
5, individually, and on behalf of all others similarly :
situated, and JANE DOE 6, individually, and on :
behalf of all others similarly situated, :
:
Plaintiffs, : CIVIL ACTION NO.
v. : 1:23-cv-10301-AS

GOVERNMENT OF THE UNITED STATES
VIRGIN ISLANDS, FIRST LADY CECILE DE
JONGH, GOVERNOR KENNETH MAPP,
SENATOR CELESTINO WHITE, ATTORNEY
GENERAL VINCENT FRAZER, GOVERNOR
JOHN DE JONGH, SENATOR CARLTON DOWE,
DELEGATE STACEY PLASKETT, and JOHN
DOES 1-100,

Defendants.

NOTICE OF MOTION BY DEFENDANT STACEY PLASKETT

PLEASE TAKE NOTICE that on a date and time set at the convenience of the Court,
Defendant Stacey Plaksett will move before the Honorable Arun Submaranian, United States
District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United
States Courthouse, 500 Pearl Street, New York, New York, for an order dismissing the
Individual and Class Action Amended Complaint filed Plaintiffs Jane Doe 1, Jane Doe 2, Jane
Doe 3, Jane Doe 4, Jane Doe 5, and Jane Doe 6 pursuant to Federal Rules of Civil Procedure
12(b)(2) and 12(b)(6). Defendant Stacey Plaskett will rely on the accompanying memorandum

of law, the Declaration of Stacey Plaskett, the chart filed in accordance with the Court's individual rules of practice.

Dated: March 28, 2024

DUANE MORRIS LLP

/s/ Eric R. Breslin

By: Eric R. Breslin
Melissa Geller
1540 Broadway
New York, NY 10036
Telephone: +1 212 692 1000
ERBreslin@duanemorris.com
MSGeller@duanemorris.com